

ARTHUR J. CASEY, ESQ. (Bar No. 123273)
CARRIE M. DUPIC, ESQ. (Bar No. 240252)
ROBINSON & WOOD, INC.
227 North First Street
San Jose, CA 95113-1016
Telephone: 408/298-7120
Facsimile: 408/298-0477
Attorneys for Defendant
TECHNIFAB PRODUCTS, INC.

e-filed 12/18/08

MARK HASSLER, ESQ.
HUNT, HASSLER & LORENZ, LLP
100 Cherry Street
Post Office Box 1527
Terre Haute, IN 47808
Attorneys for TECHNIFAB PRODUCTS, INC.
Admitted Pro Hace Vice

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CRYOTECH INTERNATIONAL, INC., a
Delaware Corporation, fka VBS
INDUSTRIES INCORPORATED

Plaintiff,

vs.

TECHNIFAB PRODUCTS, INC., an Indiana
Corporation; and DOES 1-50 inclusive

Defendants.

Case No. C08 02921 HRL

Complaint filed: June 12, 2008

**STIPULATION AND REQUEST FOR
ORDER EXTENDING DEADLINE FOR
DATES OUTLINED IN CASE
MANAGEMENT SCHEDULING ORDER
AS AMENDED BY THE COURT**

The parties exchanged initial written discovery which led to several telephone calls to meet and confer as to how best to exchange information necessary to evaluate the case and maintain confidentiality of proprietary information. In the course of that discussion the parties determined and agreed upon that an early mediation of the case was indeed possible and perhaps more practical than extended discovery and then mediation. After further discussion, the parties agreed that if the Court would agree to extend the deadlines for discovery cut off and expert

disclosure, the parties would elect Court Mediation and work with the Court appointed mediator to establish a protocol for exchange of documents and information and to conduct a meaningful mediation.

If the Court approves, the parties would propose the following amended schedule:

EVENT:	EXISTING DATE:	PROPOSED DATE:
Fact Discovery Cutoff	January 16, 2009	March 6, 2009
Designation of Experts with Reports	January 30, 2009	March 20, 2009
Designation of Rebuttal Experts with Reports	February 15, 2009	April 6, 2009
Expert Discovery Cutoff	March 20, 2009	May 8, 2009
Last day for Hearings on Dispositive Motions	April 21, 2009 at 10:00 a.m.	June 9, 2009 at 10:00 a.m.
Final Pre-Trial Conference	May 19, 2008 at 1:30 p.m.	July 14 2009
Bench Trial	May 26, 2009	July 27 , 2009

IT IS HEREBY STIPULATED:

Dated: December____,2008

ROBINSON & WOOD, INC.

By: _____/S/

ARTHUR J. CASEY
Attorneys for Defendant
TECHNIFAB PRODUCTS, INC.

Dated: December____,2008

HUNT, HASSLER & LORENZ, LLP

By: _____/S/

MARK HASSLER
Attorneys for Defendant
TECHNIFAB PRODUCTS, INC.

1 Dated: December____,2008

JOHANSON BERENSON, LLP

2
3 By: /S/

4 DAVID R. JOHNASON

5 DOUG A. RUBEL

6 SARA ADIBISEDEH

Attorneys for Plaintiff

CRYOTECH INTERNATIONAL, INC.

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8 **ORDER**

9 Good Cause thereby appearing the parties are ordered to Court mediation and the
10 scheduling order is amended as proposed

11 Dated: 12/18/08

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HOWARD R. LLOYD

UNITED STATES MAGISTRATE JUDGE